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BEFORE THE ARIZONA CORPORATION COMMISSION

MARC SPITZER
Chairman
WILLIAM A. MUNDELL
Commissioner
JEFF HATCH-MILLER
Commissioner
MIKE GLEASON
Commissioner
KRISTIN K. MAYES
Commissioner

Arizona Corporation Commission

DOCKETED

JAN 20 2005

DOCKETED BY

NR

JAN 24 2005

IN THE MATTER OF PETITION OF
TELSCAPE COMMUNICATIONS, INC.
FOR A DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER
PURSUANT TO 47 U.S.C. § 214 (e)(2)

DOCKET NO. T-04215A-04-0279

DECISION NO. 67519

ORDER

Open Meeting
January 11 and 12, 2005
Phoenix, Arizona

BY THE COMMISSION:

FINDINGS OF FACT

Procedural History

1. On April 13, 2004, Telscape Communications, Inc. ("Telscape" or "the Company") filed a Petition requesting designation as an Eligible Telecommunications Carrier ("ETC") pursuant to 47 U.S.C. § 214(e)(2) and 47 C.F.R. § 54.201.

2. No entities or person(s) filed a motion to intervene.

3. Telscape did not request a hearing in this matter.

Background

4. Telscape was granted a Certificate of Convenience and Necessity ("CC&N") to provide competitive local exchange, and intrastate interexchange wireline telecommunications in Arizona on February 13, 2004, in Decision No. 66789. Telscape currently operates as a competitive local exchange carrier ("CLEC") in California and plans to operate as a CLEC in Arizona.

5. Telscape requests that the Arizona Corporation Commission ("Commission") designate it as an ETC for the service area consisting of each of the wire centers served by Qwest Corporation ("Qwest"), a non-rural carrier. Designation as an ETC will enable Telscape to apply for and receive federal universal service support for its eligible Lifeline and Link Up subscribers. Telscape's application does not request consideration for Arizona Universal Service Fund ("AUSF") monies. Telscape would be required to submit a separate Application and obtain Commission approval in order to receive AUSF.

Requirements for Designation as an ETC

6. Designation as an ETC makes a carrier eligible to receive federal universal service funds. The requirements for designation of ETCs are specified by 47 U.S.C. § 214(e)(1). It states that "A common carrier designated as an eligible telecommunications carrier under paragraph (2) or (3) shall be eligible to receive universal service support in accordance with section 254 and shall throughout the service area for which the designation is received: (A) offer the services that are supported by Federal universal service support mechanisms under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and (B) advertise the availability of such services and the corresponding charges using media of general distribution."

7. 47 C.F.R. § 54.101, sets forth nine services that a carrier must offer in order to receive Federal universal service fund support. The services include:

(1) Voice Grade Access to the Public Switched Network. "Voice grade access" is defined as a functionality that enables a user of telecommunications services to transmit voice communications, including signaling the network that the caller wishes to place a call, and to receive voice communications, including receiving a signal indicating there is an incoming call. For purposes of this Part, bandwidth for voice grade access should be, at a minimum, 300 to 3,000 Hertz;

(2) Local usage. "Local usage" means an amount of minutes of use of exchange service, prescribed by the Commission, provided free of charge to end users;

(3) Dual Tone Multi-Frequency Signaling or its Functional Equivalent. "Dual tone multi-frequency" ("DTMF") is essentially touch tone dialing;

(4) Single-party service or its functional equivalent. "Single-party service" is a telecommunications service that permits users to have exclusive use of a wireline subscriber loop or access line for each call placed, or, in the case of wireless telecommunications carriers, which use spectrum shared among users to provide service, a dedicated message path for the length of a user's particular transmission;

(5) Access to Emergency Services. "Access to emergency services" includes access to services, such as 911 and enhanced 911, provided by local governments or other public safety organizations. 911 is defined as a service that permits a telecommunications user, by dialing the three-digit code "911", to call emergency services through a Public Service Access Point ("PSAP") operated by the local government. "Enhanced 911" is defined as 911 service that includes the ability to provide automatic numbering information ("ANI"), which enables the PSAP to call back if the call is disconnected, and automatic location information ("ALI"), which permits emergency service providers to identify the geographic location of the calling party. "Access to emergency services" includes access to 911 and enhanced 911 services to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems;

(6) Access to Operator Services. "Access to operator services" is defined as access to any automatic or live assistance to arrange for billing and/or completion of a telephone call;

(7) Access to Interexchange Service. "Access to interexchange service" is defined as the use of the loop, as well as that portion of the switch that is paid for by the end user, or the functional equivalent of these network elements in the case of a wireless carrier, necessary to access an interexchange carrier's network;

(8) Access to Directory Assistance. "Access to directory assistance" is defined as access to a service that includes, but is not limited to, making available to customers, upon request, information contained in directory listings; and

(9) Toll Limitation for Qualifying Low-Income Consumers. "Toll limitation denotes either toll blocking or toll control for eligible telecommunications carriers that are incapable of providing both services. For eligible telecommunications carriers that are capable of providing both services, 'toll limitation' denotes both toll blocking and toll control."¹

8. In order to be designated as an ETC, a carrier must also offer Lifeline and Link Up service to all qualifying low-income consumers within its service area.² Lifeline service provides basic telephone service with discounts on monthly telecommunications charges. Link Up service provides financial assistance to help cover the installation charges for telecommunications service. Finally, in the case where a competitive carrier is seeking ETC designation in the service area of a rural carrier, the State commission must find that such designation is in the public interest.

¹ 47 C.F.R. § 54.400(d)

² 47 C.F.R. §§ 54.405 and 54.411(a).

Previously, the Federal Communications Commission ("FCC") found designation of multiple ETCs in non-rural areas to be per se in the public interest based on the demonstration that the carrier complied with eligibility requirements set forth in 214(e)(1). Recently however, the FCC has conducted a more thorough public interest analysis for ETC designation in non-rural areas.

9. In its *Virginia Cellular Order*, the FCC stated, "We do not believe that designation of an additional ETC in a non-rural telephone company's study area based merely upon a showing that the requesting carrier complies with section 214(e)(1) of the Act will necessarily be consistent with the public interest in every instance."³ At the request of the FCC, the Federal-State Joint Board on Universal Service (Joint Board) reviewed the process for designating ETCs.⁴ At the time that the *Virginia Cellular Order* was issued, the FCC noted that the Joint Board was reviewing whether to modify the public interest analysis used to designate ETCs in both rural and non-rural carrier study areas under section 214(e)(1) and that the outcome of that proceeding could impact the Commission's public interest analysis for future ETC designations in non-rural carriers' service areas. The FCC is currently seeking comment on the *Recommended Decision* of the Joint Board concerning the process for designation of ETCs and the Commission's rules regarding high-cost universal service support in competitive areas.⁵ The FCC stated that the public interest analysis framework put forward in the *Virginia Cellular Order* would apply to all ETC designations pending further action by the FCC.

Telscape's Compliance with Requirements - Offering the Services Designated for Support

10. Telscape states that it will provide the services designated for support by the federal universal support mechanisms under 47 U.S.C. § 51.101(a) which include the following:

- (1) Voice grade access to the public switched network.
- (2) Local usage.
- (3) Dual tone, multi-frequency signaling or its functional equivalent.

³ *Virginia Cellular, LLC Petition for Designation as an Eligible Telecommunications Carrier In the Commonwealth of Virginia*, CC Docket No. 96-45, *Memorandum Opinion, and Order*, FCC 03-338, para 27. December 31, 2003.

⁴ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *Order*, FCC 02-307 (rel. Nov. 8, 2002) (*Referral Order*); *Federal-State Joint Board on Universal Service Seeks comment on Certain of the Commission's Rules Relating to High Cost Universal Service Support and the ETC Process*, CC Docket 96-45, 18 FCC Rcd 1941, Public Notice (rel. Feb. 7, 2003)

⁵ *Notice of Proposed Rulemaking*, CC Docket. 96-45, FCC 04-127. June 8, 2004 (NOPR); *Federal-State joint Board on Universal Service, Recommended Decision*, CC Docket 96-45, 19 FCC Rcd 4257. February 27, 2004. (*Recommended Decision*)

- (4) Single party service or its functional equivalent.
- (5) Access to emergency services.
- (6) Access to operator services.
- (7) Access to interexchange service.
- (8) Access to directory service.
- (9) Toll limitation for qualifying low-income consumers.

11. Telscape actively markets its Lifeline and Link Up service offerings in the State of California. The company's Lifeline service offerings include both basic service and a range of bundled packages that include combinations of additional features and long distance services. Telscape has indicated that it plans to offer a similar range of products upon initiation of service in Arizona.

12. While Telscape currently does not market or provide services to any customers in Arizona, the Company states that it is prepared to meet its obligations to provide the supported services throughout its requested service area immediately.⁶ It also affirms that at the time it initiates service in Arizona, it will be in compliance with all applicable federal and/or state mandates in regards to 911 and E-911, CALEA, LNP, and number optimization.⁷

13. Telscape states that it will offer a basic local exchange service that approximates the local calling area of the underlying ILEC, Qwest. Telscape has not yet filed an Arizona Local Exchange Tariff with the Arizona Corporation Commission. As per Decision No. 66789, which granted the Company a CC&N in Arizona, Telscape must file its tariff within 365 days of the Order (February 13, 2004), or 30 days prior to providing service, whichever comes first. In California, the Company's basic local service includes unlimited local calling within certain zones. It also offers a specified amount of local usage, included in the base price, in each of its bundled packages.⁸ Finally, the Company offers a basic Lifeline service that includes unlimited calling within a subscriber's local calling area.

14. Telscape states that it will offer the supported services using a combination of unbundled network elements (UNEs) provided by its underlying carrier, Qwest, and its own facilities. Telscape has yet to deploy its own equipment in Arizona, however, it maintains

⁶ Telscape's Response to Staff's First Set of Data Requests: STF 1-20.

⁷ Telscape's Response to Staff's First Set of Data Requests: STF 1-19.

⁸ The FCC has not specified a minimum local usage requirement for ETC designation. *See Federal-State Joint Board on Universal Service, Recommended Decision, CC Docket No. 96-45, 12 FCC 02J-1 (rel. Jul. 10, 2002)*

switching equipment in California. Initially, Telscape will provide service through UNEs and interconnection with its existing equipment out of state. Telscape plans to deploy network equipment in Arizona as economies of scale are reached.

15. The FCC has determined that a carrier should not be required to demonstrate that it is providing service prior to receiving ETC status.⁹ In this case, Telscape has indicated that it intends to make its service available in one hundred percent of its proposed ETC service area immediately when it initiates its Arizona service.¹⁰ The Company states: "Since a major portion of Telscape's subscribers are Lifeline/Link Up eligible subscribers, the absence of ETC designation would preclude Telscape from focusing on its target market because eligible subscribers would not consider Telscape as an option unless able to receive program subsidies."¹¹

16. Staff analyzed the application and concluded that Telscape will offer the required services including Lifeline and Link Up throughout its requested ETC service area and recommended that the Commission find that Telscape meets this requirement for ETC designation.

Telscape's Compliance with Requirements - Advertising of Supported Services

17. Telscape states that it will advertise the availability of its supported services and the corresponding charges using media of general distribution as required by 47 U.S.C. § 214(e)(1)(B). Telscape has not begun advertising efforts in the State of Arizona to date.¹² However, the company intends to advertise through several different forums as it currently does in California. Telscape's advertising efforts will include television, general distribution, Hispanic newspapers, internet web-site, retail outlets, and community outreach. The company plans to conduct advertising in both Spanish and English.

18. While it is clear that Telscape intends to embark on a general marketing campaign, it must advertise the availability of the *supported services* throughout the service area for which it

⁹ *Federal-State Joint Board on Universal Service, Western Wireless Corporation Petition for Preemption of an Order of the South Dakota Public Utilities Commission, Declaratory Ruling, CC Docket No. 96-45, 15 FCC Rcd 15168 at 15175, para 17 (2000).*

¹⁰ Telscape's Response to Staff's First Set of Data Requests: STF 1-15.

¹¹ Telscape's Response to Staff's First Set of Data Requests: STF 1-5.

¹² The FCC has stated that ETC designation requires that a carrier advertise its supported services once it has been designated as an ETC, but that a carrier is not required to advertise its supported services prior to ETC designation. See *RCC Holdings, Inc. Petition for Designation as an Eligible Telecommunication Carrier Throughout its Licensed Service Area In the State of Alabama*, CC Docket No. 96-45, Memorandum Opinion and Order, Rlstd. Para. 21, November 27 2002.

1 seeks ETC status. Since Telscape will not be eligible for high-cost support in its requested ETC
2 service area even if it is granted ETC status, the services for which it seeks universal service
3 funding are Lifeline and Link Up. Lifeline service is defined as a discounted retail service offering
4 that is available to qualifying low-income consumers that includes the nine requirements listed
5 above and in 47 C.F.R. § 54.101.¹³ Lifeline service is “plain old telephone service.” Federal
6 universal service support for Lifeline does not include a subsidy for features such as Caller ID,
7 Three Way Calling, or Call Waiting.

8 19. While Telscape states that it will offer a basic local calling plan and Lifeline
9 service, its marketing and advertising efforts are clearly focused on bundled packages. For
10 example, Telscape submitted several examples of its California marketing materials in response to
11 Staff’s First set of Data Requests that do not reference basic local service or basic Lifeline service.
12 Moreover, a potential subscriber seeking more information from Telscape’s web-site regarding
13 basic local exchange service or basic Lifeline service would not find such information unless that
14 customer looked at Telscape’s retail tariff.¹⁴ Neither basic local exchange nor basic Lifeline
15 service are listed in the “services overview” or the “rates” section of the web-site and neither is
16 shown as an option in the “bundles and packages” section that essentially shows all of Telscape’s
17 service offerings.

18 20. Based upon the above, Staff concluded that in order to meet this requirement,
19 Telscape must make further commitments to advertise the availability of its supported services and
20 charges (specifically basic Lifeline and Link Up) using media of general distribution as required
21 by 47 U.S.C. § 214(e)(1)(B). Additionally, the Company must commit to advertise the availability
22 of these services throughout the requested service area. Finally, the Company must provide
23 examples of the advertising efforts for Staff review. Staff recommended that the Commission find
24 that Telscape meets this ETC designation criteria in its requested non-rural service area subject to
25 these conditions.

26 ...
27

¹³ 47 C.F.R. § 54.401

28 ¹⁴ Telscape has not yet filed an Arizona Local Exchange Tariff with the Arizona Corporation Commission. As per
Decision No. 66789, Telscape must file its tariff within 365 days of the Order (February 13, 2004), or 30 days prior to
providing service, whichever comes first.

1 **Public Interest Determination**

2 21. As noted above, previously, the FCC found designation of multiple ETCs in non-
3 rural areas to be per se in the public interest based on the demonstration that the carrier complied
4 with eligibility requirements set forth in 214(e)(1).

5 22. In the *Virginia Cellular Order*, the FCC concluded that Virginia Wireless had met
6 the public interest showing based on its commitments to provide high quality service and the fact
7 that it had met the public interest requirement for the rural study areas for which it was seeking
8 ETC designation.¹⁵ In a subsequent application, ALLTEL Communications, Inc. sought
9 designation as an ETC in its non-rural licensed service areas in five states. The FCC found that
10 ALLTEL had met the public interest requirement based on its detailed commitments to provide
11 high quality of service, provide the FCC with customer complaint data, provide the FCC with
12 information on the use of universal service funds, and specific plans to respond to requests for
13 service.¹⁶ The *ALLTEL Order* provides further guidance on the public interest analysis in non-
14 rural study areas. As such, we have examined Telscape's application in the context of this newly
15 established public interest framework.

16 23. To satisfy the public interest standard, Telscape must, at a minimum, make
17 commitments with respect to service quality, reporting practices, and regulatory compliance.
18 Telscape must also demonstrate the ability to serve its designated area within a reasonable amount
19 of time.

20 24. Due to the nature of Telscape's business plan, it is prepared to offer customers
21 high-quality service immediately upon initiating service in Arizona. Any network augmentation
22 will serve the purpose of reducing long-term costs and achieving economies of scale rather than
23 improving service quality.¹⁷ With respect to customer service, Telscape states that it will offer 24-
24 hour access to bilingual customer service representatives and respond to customer complaints
25 ...

26 ¹⁵ *Virginia Cellular, LLC Petition for Designation as an Eligible Telecommunications Carrier In the Commonwealth*
27 *of Virginia*, CC Docket No. 96-45, *Memorandum Opinion, and Order*, FCC 03-338, para 27. December 31, 2003.

28 ¹⁶ *ALLTEL Communications, Inc., Petition for Designation as an Eligible Telecommunications Carrier in the state of*
Alabama, Florida, Georgia, North Carolina, and the Commonwealth of Virginia, CC Docket No. 96-46, *Order*, DA
04-3046, September 24, 2004.

¹⁷ Telscape's Response to Staff's First Set of Data Requests: STF 1-11.

1 received by the Commission pursuant to Commission direction.¹⁸ Staff concluded that subject to
2 Telscape fulfilling these commitments, the Company has satisfied this requirement.

3 25. With respect to Telscape's ability to serve its entire requested service area within a
4 reasonable amount of time, Telscape has indicated that its interconnection agreement with Qwest
5 will allow it to immediately serve any customer that requests service.¹⁹ The Company states,
6 "Subsequent network deployment will serve to enhance subscribers' choice of service features and
7 will increase network efficiency and reduce costs, but will not materially impact Telscape's
8 capability to offer high quality of service from the onset."²⁰ As part of its application for a
9 Certificate of Convenience and Necessity to provide resold interexchange and facilities-based local
10 exchange service in the State of Arizona, Telscape provided audited financial statements which
11 indicate that Telscape has adequate financial resources to fulfill its obligations as an ETC.

12 26. In its application, Telscape stresses that it will provide a competitive choice to those
13 Lifeline and Link Up-eligible customers currently served by Qwest. Currently, low income
14 customers do not have a competitive choice in universal service offerings in service areas where
15 Qwest is the sole ETC. As such, Telscape's entry into the market will provide captive customers
16 with a choice in providers and some unique service offerings. Telscape states that its service
17 offerings include unique options such as free Telscape-to-Telscape customer calling and a wide
18 variety of bundled service plans that combine local exchange, extra features, long distance, and
19 international services. Many of Telscape's bundled service offerings focus on international service
20 to Mexico.

21 27. Telscape maintains that its designation as an ETC will have no impact on the
22 universal service fund because "Telscape would simply be stepping into the shoes of the
23 incumbent carrier for former incumbent subscribers it would now serve."²¹ In the case where
24 Telscape captures a customer that previously did not take service under the Lifeline or Link Up
25 offerings, Telscape points out that it is the qualification of the customer to receive such service,
26 and not Telscape's status as an ETC, that would impact the universal service fund.

27 ¹⁸ Telscape's Response to Staff's First Set of Data Requests: STF 1-32.

28 ¹⁹ Telscape's Response to Staff's First Set of Data Requests: STF 1-38.

²⁰ Telscape's Response to Staff's First Set of Data Requests: STF 1-20.

²¹ Telscape's Response to Staff's First and Second Sets of Data Requests. STF 1-47 and STF 2-6.

28. Staff found that Telscape satisfies the public interest showing for ETC designation in the non-rural service area consisting of each of the wire centers served by Qwest. Subject to conditions that require specific commitments from the company regarding quality of service, customer service, reporting requirements, and regulatory compliance, Staff recommended that the Commission find the designation of Telscape Communications, Inc. as an ETC to be in the public interest.

Designated Service Area

29. The Commission must establish a geographic area for the purpose of determining universal service obligations and support mechanisms for each designated ETC. See 47 U.S.C. § 214(e)(2); 47 C.F.R. § 54.201(b).

30. Telscape was granted a Certificate of Convenience and Necessity to provide competitive local exchange, and intrastate interexchange wireline telecommunications in Arizona on February 13, 2004, in Decision No. 66789. Telscape requests that the Commission designate it as an ETC for the service area consisting of each of the wire centers served by Qwest, a non-rural carrier. Exhibit A contains a listing of all wire centers that exist within the requested ETC service area.

Conclusion

31. Staff recommended Telscape's Application for designation as an ETC be approved subject to the following conditions:

(1) Telscape shall submit an advertising plan for supported services including Basic Lifeline and Link Up services to Staff for review thirty (30) days prior to commencing service. Advertising campaigns focused on bundles or packages must also specifically highlight the supported services (basic local exchange service) on a stand alone basis. Telscape shall commit to engaging in this campaign throughout the entire service area for which it receives ETC designation. The company must also commit to including these basic service offerings on its web-site in its "service offerings" section.

(2) Telscape shall be required to provide service quality data following a request by Commission Staff. Telscape shall provide such data within the timeframe given in Staff's request to Telscape.

(3) Telscape shall submit any consumer complaints that may arise from its Lifeline or Link Up offerings to the Commission's Consumer Service Division, provide a regulatory contact, and comply with the provisions of the Commission's customer service and termination of service rules.

(4) Telscape shall be required to submit an annual report that contains its total number of Lifeline and Linkup subscribers, total amount of USF support received, and an affidavit stating that the Lifeline and Linkup discounts are equal to the amount of total USF support per line by February 1 of each year, beginning February 1, 2006.

32. Conditioned on Telscape's compliance with the conditions set forth in Findings of Fact No. 31 herein, we find that Telscape meets the requirements to be designated as an Eligible Telecommunications Carrier under U.S.C. § 214(e)(1), for the non-rural service area that includes all wire centers served by Qwest.

CONCLUSIONS OF LAW

1. Telscape is a public service corporation as defined in Article XV Section 2 of the Arizona Constitution. Telscape Communications, Inc. is a telecommunications corporation as defined in A.R.S. § 40-201. Telscape was granted a Certificate of Convenience and Necessity to provide competitive local exchange, and intrastate interexchange wireline telecommunications in Arizona on February 13, 2004, in Decision No. 66789.

2. The Commission has jurisdiction over the subject matter of the application.

3. Telscape meets the requirements for ETC designation under U.S.C. § 214(e)(1) subject to Telscape's compliance with the conditions set forth in Findings of Fact No. 31 herein.

4. It is in the public interest to designate Telscape as an ETC in the non-rural requested service area, subject to Telscape's compliance with the conditions set forth in Findings of Fact No. 31 herein.

ORDER

IT IS THEREFORE ORDERED that the application of Telscape Communications, Inc. for designation as an Eligible Telecommunications Carrier pursuant to U.S.C. § 214(e)(1) for the purpose of receiving federal universal service support in Arizona, for the service area set forth in Exhibit A attached hereto and incorporated herein by reference, is hereby approved, subject to Telscape Communications, Inc.'s compliance with the conditions set forth in Findings of Fact No. 31 above.

...

...

IT IS FURTHER ORDERED that Telscape Communications, Inc. shall submit an advertising plan for supported services including Basic Lifeline and Link Up services to Staff for review thirty (30) days prior to commencing service.

IT IS FURTHER ORDERED that Telscape Communications, Inc. shall be required to submit an annual report that contains its total number of Lifeline and Linkup subscribers, total amount of USF support received, and an affidavit stating that the Lifeline and Linkup discounts are equal to the amount of total USF support per line by February 1 of each year, beginning February 1, 2006.

IT IS FURTHER ORDERED that this Decision shall become effective immediately.

BY THE ORDER OF THE ARIZONA CORPORATION COMMISSION


CHAIRMAN


COMMISSIONER


COMMISSIONER


COMMISSIONER


COMMISSIONER

IN WITNESS WHEREOF, I BRIAN C. McNEIL, Executive Secretary of the Arizona Corporation Commission, have hereunto, set my hand and caused the official seal of this Commission to be affixed at the Capitol, in the City of Phoenix, this 20th day of Jan., 2005.


BRIAN C. McNEIL
Executive Secretary

DISSENT: _____

DISSENT: _____

EGJ:EEC:rdp/TS

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Telscape Communications, Inc. ETC Application

Exhibit A

Requested ETC Service Area

ILEC	Wire Center Code	Wire Center Location	Classification
Qwest Corporation	TCSNAZCA	CATALINA	Non-Rural
Qwest Corporation	CHNDAZMA	CHANDLER MAIN	Non-Rural
Qwest Corporation	CHNDAZWE	CHANDLER WEST	Non-Rural
Qwest Corporation	DRVYAZNO	DEER VALLEY NORTH	Non-Rural
Qwest Corporation	TCSNAZFW	FLOWING WELLS	Non-Rural
Qwest Corporation	MESAAZGI	GILBERT	Non-Rural
Qwest Corporation	GLDLAZMA	GLENDALE MAIN	Non-Rural
Qwest Corporation	TEMPAZMC	MCCLINTOCK	Non-Rural
Qwest Corporation	MESAAZMA	MESA	Non-Rural
Qwest Corporation	PHNXAZPR	PHNX PEORIA	Non-Rural
Qwest Corporation	PHNXAZSE	PHNX SOUTHEAST CAP	Non-Rural
Qwest Corporation	PHNXAZMY	PHNX-MAYVALE CAP	Non-Rural
Qwest Corporation	PHNXAZWE	PHOENIX WEST CAP	Non-Rural
Qwest Corporation	PHNXAZBW	PHOENIX-BETHANY WEST	Non-Rural
Qwest Corporation	PHNXAZCA	PHOENIX-CACTUS	Non-Rural
Qwest Corporation	PHNXAZEA	PHOENIX-EAST	Non-Rural
Qwest Corporation	PHNXAZ81	PHOENIX-FOOTHILLS	Non-Rural
Qwest Corporation	PHNXAZGR	PHOENIX-GREENWAY	Non-Rural
Qwest Corporation	PHNXAZMA	PHOENIX-MAIN	Non-Rural
Qwest Corporation	PHNXAZMR	PHOENIX-MID RIVERS	Non-Rural
Qwest Corporation	PHNXAZNO	PHOENIX-NORTH	Non-Rural
Qwest Corporation	PHNXAZNE	PHOENIX-NORTHEAST	Non-Rural
Qwest Corporation	PHNXAZNW	PHOENIX-NORTHWEST	Non-Rural
Qwest Corporation	PHNXAZPP	PHOENIX-PECOS	Non-Rural
Qwest Corporation	PHNXAZSO	PHOENIX-SOUTH	Non-Rural
Qwest Corporation	PHNXAZSY	PHOENIX-SUNNYSLOPE	Non-Rural
Qwest Corporation	TCSNAZRN	RINCON	Non-Rural
Qwest Corporation	SCDLAZMA	SCOTTSDALE MAIN	Non-Rural
Qwest Corporation	SCDLAZSH	SHEA	Non-Rural
Qwest Corporation	AGFIAZSR	SUNRISE	Non-Rural
Qwest Corporation	SPRSAZWE	SUPERSTITION WEST	Non-Rural
Qwest Corporation	TCSNAZCR	TCSN CRAYCROFT	Non-Rural
Qwest Corporation	TCSNAZSO	TCSN SOUTH CAP	Non-Rural
Qwest Corporation	TEMPAZMA	TEMPE MAIN	Non-Rural
Qwest Corporation	SCDLAZTH	THUNDERBIRD	Non-Rural
Qwest Corporation	TCSNAZEA	TUCSON EAST	Non-Rural
Qwest Corporation	TCSNAZMA	TUCSON MAIN	Non-Rural
Qwest Corporation	TCSNAZNO	TUCSON NORTH-1A CAP	Non-Rural
Qwest Corporation	YUMAAZMA	YUMA	Non-Rural
Qwest Corporation	BRDSAZMA	BEARDSLEY	Non-Rural
Qwest Corporation	CSGRAZMA	CASA GRANDE	Non-Rural
Qwest Corporation	CVCKAZMA	CAVE CREEK	Non-Rural
Qwest Corporation	CHNDAZSO	CHANDLER SOUTH	Non-Rural
Qwest Corporation	GDYRAZCW	COLDWATER	Non-Rural
Qwest Corporation	CRNDAZMA	CORONADO	Non-Rural
Qwest Corporation	TCSNAZCO	CORTARO	Non-Rural
Qwest Corporation	CTWDAZMA	COTTONWOOD-MAIN	Non-Rural
Qwest Corporation	CTWDAZSO	COTTONWOOD-SOUTH	Non-Rural
Qwest Corporation	FLGSAZEA	FLAGSTAFF EAST	Non-Rural

Telscape Communications, Inc. ETC Application

Exhibit A

Requested ETC Service Area

ILEC	Wire Center Code	Wire Center Location	Classification
Qwest Corporation	FLGSAZMA	FLAGSTAFF MAIN	Non-Rural
Qwest Corporation	FTMDAZMA	FORT MCDOWELL	Non-Rural
Qwest Corporation	GLOBAZMA	GLOBE	Non-Rural
Qwest Corporation	GNVYAZMA	GREEN VALLEY	Non-Rural
Qwest Corporation	LTPKAZMA	LITCHFIELD PARK	Non-Rural
Qwest Corporation	NGLSAZMA	NOGALES	Non-Rural
Qwest Corporation	NGLSAZMW	NOGALES MIDWAY	Non-Rural
Qwest Corporation	PAGEAZMA	PAGE	Non-Rural
Qwest Corporation	PYSNAZMA	PAYSON	Non-Rural
Qwest Corporation	PRVYAZPP	PINNACLE PEAK	Non-Rural
Qwest Corporation	PRSCAZEA	PRESCOTT EAST	Non-Rural
Qwest Corporation	PRSCAZMA	PRESCOTT MAIN	Non-Rural
Qwest Corporation	SEDNAZMA	SEDONA	Non-Rural
Qwest Corporation	SEDNAZSO	SEDONA SOUTH	Non-Rural
Qwest Corporation	SRVSAZMA	SIERRA VISTA MAIN	Non-Rural
Qwest Corporation	SPRSAZEA	SUPERSTITION EAST	Non-Rural
Qwest Corporation	SPRSAZMA	SUPERSTITION MAIN	Non-Rural
Qwest Corporation	TCSNAZTV	TANQUE VERDE	Non-Rural
Qwest Corporation	TLSNAZMA	TOLLESON	Non-Rural
Qwest Corporation	TCSNAZSE	TUCSON SOUTHEAST	Non-Rural
Qwest Corporation	TCSNAZWE	TUCSON WEST	Non-Rural
Qwest Corporation	YUMAAZFT	YUMA FORTUNA	Non-Rural
Qwest Corporation	YUMAAZSE	YUMA SOUTHEAST	Non-Rural
Qwest Corporation	ASFKAZMA	ASHFORK	Non-Rural
Qwest Corporation	BNSNAZMA	BENSON	Non-Rural
Qwest Corporation	BISBAZMA	BISBEE	Non-Rural
Qwest Corporation	BLCNAZMA	BLACK CANYON	Non-Rural
Qwest Corporation	BCKYAZMA	BUCKEYE	Non-Rural
Qwest Corporation	CMVRAZMA	CAMP VERDE	Non-Rural
Qwest Corporation	CHVYAZMA	CHINO VALLEY	Non-Rural
Qwest Corporation	CRCYAZMA	CIRCLE CITY	Non-Rural
Qwest Corporation	CLDGAZMA	COOLIDGE	Non-Rural
Qwest Corporation	DGLSAZMA	DOUGLAS	Non-Rural
Qwest Corporation	DDVLAZNM	DUDLEYVILLE	Non-Rural
Qwest Corporation	ELOYAZ01	ELOY	Non-Rural
Qwest Corporation	FLGSAZSO	FLAGSTAFF SOUTH	Non-Rural
Qwest Corporation	FLRNAZMA	FLORENCE	Non-Rural
Qwest Corporation	GLBNAZMA	GILA BEND	Non-Rural
Qwest Corporation	GRCNAZMA	GRAND CANYON	Non-Rural
Qwest Corporation	HYDNAZMA	HAYDEN	Non-Rural
Qwest Corporation	HGLYAZMA	HIGLEY	Non-Rural
Qwest Corporation	HMBLAZMA	HUMBOLDT	Non-Rural
Qwest Corporation	JSCYAZMA	JOSEPH CITY	Non-Rural
Qwest Corporation	KRNYAZMA	KEARNY	Non-Rural
Qwest Corporation	MMTHAZMA	MAMMOTH	Non-Rural
Qwest Corporation	MARNAZMA	MARANA	Non-Rural
Qwest Corporation	MARNAZ02	MARANA WEST	Non-Rural
Qwest Corporation	MRCPAZMA	MARICOPA	Non-Rural
Qwest Corporation	MAYRAZMA	MAYER	Non-Rural

Telscape Communications, Inc. ETC Application

Exhibit A

Requested ETC Service Area

ILEC	Wire Center Code	Wire Center Location	Classification
Qwest Corporation	MIAMAZMA	MIAMI	Non-Rural
Qwest Corporation	TCSNAZML	MOUNT LEMMON	Non-Rural
Qwest Corporation	MSPKAZMA	MUNDS PARK	Non-Rural
Qwest Corporation	NWRVAZMA	NEW RIVER	Non-Rural
Qwest Corporation	NGLSAZ03	NOGALES RIO RICO	Non-Rural
Qwest Corporation	ORCLAZMA	ORACLE	Non-Rural
Qwest Corporation	PLMNAZMA	PALOMINAS	Non-Rural
Qwest Corporation	PTGNAZMA	PATAGONIA	Non-Rural
Qwest Corporation	PTGNAZEL	PATOGONIA ELGIN	Non-Rural
Qwest Corporation	PHNXAZLV	PHOENIX-LAVEEN	Non-Rural
Qwest Corporation	PIMAAZMA	PIMA	Non-Rural
Qwest Corporation	PINEAZMA	PINE	Non-Rural
Qwest Corporation	HGLYAZQC	QUEEN CREEK	Non-Rural
Qwest Corporation	CMVRAZRR	RIMROCK	Non-Rural
Qwest Corporation	FTMDAZNO	RIO VERDE	Non-Rural
Qwest Corporation	SFFRAZMA	SAFFORD	Non-Rural
Qwest Corporation	BNSNAZSD	SAINT DAVID	Non-Rural
Qwest Corporation	SNMNAZMA	SAN MANUEL	Non-Rural
Qwest Corporation	SRVSAZNO	SIERRA VISTA NO	Non-Rural
Qwest Corporation	SRVSAZSO	SIERRA VISTA SO	Non-Rural
Qwest Corporation	SMTNAZMA	SOMERTON	Non-Rural
Qwest Corporation	STFDAZMA	STANFIELD	Non-Rural
Qwest Corporation	SPRRAZMA	SUPERIOR	Non-Rural
Qwest Corporation	TMBSAZMA	TOMBSTONE	Non-Rural
Qwest Corporation	TNCKAZMA	TONTO CREEK	Non-Rural
Qwest Corporation	TUBCAZMA	TUBAC	Non-Rural
Qwest Corporation	TCSNAZSW	TUCSON SOUTHWEST	Non-Rural
Qwest Corporation	VAILAZNO	VAIL NORTH	Non-Rural
Qwest Corporation	VAILAZSO	VAIL SOUTH	Non-Rural
Qwest Corporation	WLTNAZMA	WELLTON	Non-Rural
Qwest Corporation	WHTKAZMA	WHITE TANKS	Non-Rural
Qwest Corporation	WHTLAZMA	WHITLOW	Non-Rural
Qwest Corporation	WCBGAZMA	WICKENBURG	Non-Rural
Qwest Corporation	WLCXAZMA	WILLCOX	Non-Rural
Qwest Corporation	WLMSAZMA	WILLIAMS	Non-Rural
Qwest Corporation	WNSLAZMA	WINSLOW	Non-Rural
Qwest Corporation	WNBGAZ01	WINTERSBURG	Non-Rural
Qwest Corporation	YRNLAZMA	YARNELL	Non-Rural